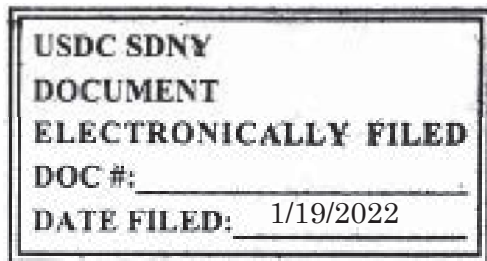


# Federal Defenders OF NEW YORK, INC.

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January 17, 2022

**BY ECF**

Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Andrew Joyner,**  
**20 Cr. 505 (AJN)**

Dear Judge Nathan:


I write to provide the Court with a status update regarding a pre-trial resolution in the above-captioned case. The parties are nearly finished finalizing the terms of a written plea agreement and request leave to provide the Court with the anticipated agreement and a proposed date for a change-of-plea conference on or before February 18, 2022. The Government consents to this application. Because this additional period of delay is necessary to finalize a resolution to ongoing plea negotiations, the parties respectfully request that the Court exclude this time from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(7)(A).

The Court finds that the interests of justice served by granting an exclusion from the speedy trial computations from today's date through February 18, 2022 outweigh the interests of the public and the Defendant in a speedy trial in order to allow the parties to continue their discussions towards a pre-trial disposition of this case.

SO  
ORDERED

Respectfully Submitted, 

1/18/2022

  
Andrew J. Daback, Esq.  
Assistant Federal Defender

Cc: AUSA Andrew Rohrbach  
Counsel for the Government

Counsel for Andrew Joyner